

Exhibit 2

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JERMAINE DOCKERY, *et al.*,

Plaintiffs,

v.

Civil Action No. 3:13cv326-WHB-JCG

PELICIA HALL, *et. al.*,

Defendants.

**SO-ORDERED STIPULATION GOVERNING DEADLINES FOR EXPERT
DISCOVERY**

Plaintiffs and Defendant, by and through their attorneys of record, hereby stipulate and agree, and the Court hereby orders, that:

WHEREAS, on August 24, 2018, the Court entered an Order (the “August 24, 2018 Order”) (ECF No. 767) directing Plaintiffs to submit supplemental expert reports on or before November 16, 2018;

WHEREAS, Plaintiffs have requested that Defendant produce certain documents for their expert witnesses’ review to comply with the August 24, 2018 Order;

WHEREAS, Defendant has not yet produced certain of the documents Plaintiffs have requested;

WHEREAS, on October 22, 2018, Plaintiffs filed a Motion for Expert Discovery Relief (ECF No. 791) seeking to compel the production of use of force reports and videos and certain

custodial files, namely administrative remedy program documents, rule violation reports, and segregation records, concerning certain specified members of the plaintiff class;

WHEREAS, on October 30, 2018, the Court entered an Order (the “October 30, 2018 Order”) (ECF No. 794) granting the Motion for Expert Discovery Relief and ordering Defendant to produce the materials requested in the Motion for Expert Discovery Relief by the close of business on October 31, 2018;

WHEREAS, on October 31, 2018, Defendant filed an Emergency Motion for Extension of Time (ECF No. 795), seeking until the close of business on Friday, November 2, 2018, to comply with the Court’s October 30, 2018 Order;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs and Defendants that:

1. Plaintiffs do not oppose Defendant’s Emergency Motion for Extension of Time. Plaintiffs consent to Defendant’s production, by the close of business on Friday, November 2, 2018, of all documents (including videos) that, in the October 30, 2018 Order, the Court ordered Defendant to produce by the close of business on October 31, 2018.

2. Defendant will also produce by the close of business on Friday, November 2, 2018, the following additional documents, each of which has been previously requested by Plaintiffs and which Defendant has not yet produced:

- a. Revised copies of the monthly statistical reports and monthly on-site contract monitoring reports that were produced in a redacted format on October 5, 2018, unredacted to the extent Plaintiffs last proposed on October 24 and 26, 2018, respectively;

- b. Any missing shift rosters that Plaintiffs requested and were not produced on October 5, 2018, or written confirmation none exist, to the extent that is true for any days or shifts;
- c. Videos and color photographs associated with specific extraordinary occurrence reports, to the extent Plaintiffs requested on October 22, 2018;
- d. A current bed roster, which Dr. Bruce Gage and Eldon Vail reviewed on site at the East Mississippi Correctional Facility (“EMCF”) and which Plaintiffs requested on October 22, 2018;
- e. A list of prisoners placed on psychiatric or suicide observation in 2018, which Dr. Gage reviewed on site at EMCF and which Plaintiffs requested on October 22, 2018;
- f. The post order for the EMCF Acute Care Unit, which Dr. Gage reviewed on site at EMCF and which Plaintiffs requested on October 22, 2018;
- g. EMCF health care staffing rosters for all shifts for the following dates: Feb. 1-8, 2018, April 1-7, 2018, August 13-21, 2018, Sept. 2-9, 2018;
- h. Any EMCF health care staffing plans; and,
- i. Any EMCF health care staffing analysis.

3. Defendant will provide written confirmation by the close of business on November 2, 2018, that it has produced all documents in its possession, custody, or control from 2018 that are responsive to the requests identified in Paragraph 2 or the production of which was ordered in the October 30, 2018 Order.

SO STIPULATED.

Dated: November 1, 2018

BY: _____

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IT IS SO ORDERED:

DATED: November __, 2018

UNITED STATES MAGISTRATE JUDGE